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MEMO ENDORSED P. 2

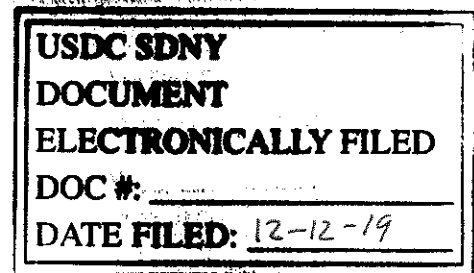
December 11, 2019

NEW YORK, NY
EAST MEADOW, NY
WHITE PLAINS, NY
ROSELAND, NJ
ROCHESTER, NY
STAMFORD, CT

BY ECF

Hon. Richard M. Berman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
Courtroom 17B
500 Pearl Street
New York, New York 10007-1312

Re: E.L.A. v. Abbott House
Civil Action No. 16 CV 1688 (RMB) (JLC)
MCB File No. 551-85252



Dear Judge Berman:

We represent the defendant Roslyn Murov, M.D. ("Dr. Murov") in the above-referenced matter.

On November 12, 2019, the parties participated in a telephone conference with Magistrate James L. Cott. Magistrate Cott subsequently issued an Order extending the deadline for fact discovery to February 14, 2020, and directing the parties to clarify the date by which expert discovery must be completed. Magistrate Cott also directed the parties to request an adjournment of the status conference, currently scheduled for January 16, 2020.

On December 9 and December 10, I circulated a proposed schedule for expert discovery to the other parties. Although only one party affirmatively agreed to the proposed schedule, I

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indicated that if I did not receive any objections by today, I would file this letter under the assumption that all parties agreed with the proposed dates. I have not heard any objections.

Accordingly, if acceptable to the Court, we propose that plaintiff's counsel serve expert disclosure by March 2, 2020. The defendants will serve expert disclosure by April 1, 2020. The depositions of plaintiff's experts will be conducted by April 10, 2020, and defendants' expert will be deposed by April 30, 2020. The parties request that the Court schedule a conference for some time thereafter, as all defendants anticipate making motions for summary judgment.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

MARTIN CLEARWATER & BELL LLP



Gregory J. Radomisli (GJR 2670)

cc: BY ECF

All parties

The Court will conduct a
status conference on 1/16/20
@ 12:45. Counsel to take up
expert discovery w. J. Cott.
SO ORDERED:
Date: 12/12/19 Richard M. Berman
Richard M. Berman, U.S.D.J.